U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Central Transport Dye Spill - Removal Polrep
Initial and Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
First and Final POLREP
Central Transport Dye Spill

Romulus, MI
Latitude: 42.2366500 Longitude: -83.3192590

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From: Jon Gulch, On-Scene Coordinator
Date: 10/30/2014
Reporting Period: September 9-October 9, 2014

1. Introduction

1.1 Background

Site Number:	C54F	**Contract Number:**	EP-S5-09-05
D.O. Number:	157	**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Emergency
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	9/9/2014	**Start Date:**	9/9/2014
Demob Date:	10/2/2014	**Completion Date:**	10/9/2014
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description
Local Roads and parking lot at the First Industrial Transportation Facility in Romulus, Wayne County, Michigan.

1.1.2.1 Location
28420 Highland Road, Romulus, Wayne County, MI 48174

1.1.2.2 Description of Threat
Dye (containing Urea) spill onto the parking lot and storm sewer system of the First Industrial transportation facility. The dye was a threat to the Sloss and Ganong Drain, which is a tributary to the Sexton and Kilfoil Drain, Ecorse River, Detroit River and Lake Erie. There was a scheduled large rain event which would potentially worsen the potential for a large release to these waterways.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
The spilled dye was covering an area approximately 100 yards x 50 yards in the parking lot and approximately 1.5 miles on area roadways. In addition, the on-site retention pond was red from the run-off to the storm sewer system.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative
On September 8, 2014, Central Transport encountered a release from a punctured tote of red dye with multiple constituents including Urea, Acid Red and Acid Yellow. The Romulus Fire Department (RFD) responded and was assured that the clean-up of the truck, parking lot and local road would be completed by the next day. When RFD returned on September 9, 2014, the Central Transport truck was gone, but the parking lot and road were not cleaned. RFD immediately contacted Central Transport and began overseeing their clean-up. Late in the afternoon of September 9, 2014, RFD contacted EPA and asked for assistance in getting the dye spill cleaned-up prior to a predicted large scale rain event on September 10, 2014.

2.1.2 Response Actions to Date
The Potentially Responsible Party (PRP) was not making sufficient progress towards cleaning the impacted on site storm sewer system, parking lot and local roads. The onsite storm water sewer system drains to a retention pond that empties into a creek that leads offsite. A predicted large scale rain event scheduled for September 10, 2014 coupled with the uncertainty of onsite and offsite conditions being affected with storm water from the impacted onsite storm sewer system, lead to EPA mobilizing its Emergency and Rapid Removal (ERRS) contractor to assist in removing the dye prior to the rain event. Additionally, EPA activated its Superfund Technical Response and Assessment Team (START) to conduct oversight documentation of ERRS and PRP contractors, site reconnaissance and water quality monitoring.

During the morning of September 10, 2014, the PRP contractors completed the excavation (6" scrape of grass & topsoil) of dye impacted soil and ERRS began the process of applying absorbent clay granules (oil-dry) on the public street leading to the commercial complex. Both of these efforts were undertaken to remove gross staining and prevent the occurrence of dye impacted storm water entering the public storm sewer system and navigable waters of the State. During the late morning on September 10, 2014, the PRP contractors began the process of cleaning the impacted storm sewer system (jet flushing and jet rodding) but could not complete due to inclement weather. EPA documented the release of impacted storm water from the on-site commercial complex storm sewer system into a retention pond with limited capacity to retain a large volume of water. An associated retention pond pump automatically turns on to empty the retention pond and prevent on-site flooding issues at the commercial complex. The creek leads to the Ecorse River Watershed and eventually into the Detroit River. Representatives from the commercial complex were able to manually shut the retention pond pump off for only a limited time before incurring onsite flooding issues. The retention pond received impacted storm sewer runoff (bright red) and there was no visual evidence of the red dye entering the creek both during and after the rain fall event, however, the Sloss and Ganong Drain was at near flood level and the red dye was masked by the turbidity of the water.

From September 10-16, EPA and START continued to monitor the retention pond and the Sloss and Ganong Drain conducting "spot checks" to confirm the absence or presence of possible fish kills or impacted wildlife. START also conducted multiple rounds of water quality monitoring (using a YSI Water Quality Meter) focusing on dissolved oxygen levels within the creek.

From September 16-October 9, 2014, EPA worked with the PRP to ensure for proper disposal of all contaminated debris and solid waste accumulated on-site during the dye spill.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
Central Transport is the Responsible Party for this spill.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Chromatint Red 2629 (Red Dye containing Urea)	Liquid	3 Drums			
Contaminated Soil (Soil with Chromatint containing Urea)	Soil	40 Cubic Yards			

Contaminated Debris (Floor Dry with Chromatint containing Urea)	Soil	3 Drums			

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	0
	Cubic yards of contaminated sediments removed and/or capped	5
	Gallons of oil/water recovered	0
	Acres of soil/sediment cleaned up in floodplains and riverbanks	0.5
Stand Alone Assessment	Number of contaminated residential yards cleaned up	0
	Number of workers on site	100
Contaminant(s) of Concern	Urea (in Red Dye)	
Oil Response Tracking		
Estimated volume	Initial amount released	N/A
	Final amount collected	N/A
CANAPS Info	FPN Ceiling Amount	N/A
	FPN Number	N/A
	Body of Water affected	N/A

Administrative and Logistical Factors (Place X where applicable)		
Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	Community challenges or high involvement	Radiological
More than one PRP	Endangered Species Act / Essential Fish Habitat issues	Explosives
AOC	Historic preservation issues	Residential impacts
UAO	NPL site	Relocation
DOJ involved	Remote location	Drinking water impacted
X Criminal Investigation Division involved	Extreme weather or abnormal field season	Environmental justice
Tribal consultation or coordination or other issues	Congressional involvement	High media interest
Statutory Exemption for $2 Million	Statutory Exemption for 1 Year	Active fire present
Hazmat Entry Conducted – Level A, B or C	Incident or Unified Command established	Actual air release (not threatened)

Green Metrics		
Metric	**Amount**	**Units**
Diesel Fuel Used		gallons
Unleaded Fuel Used		gallons
X Alternative/E-85 Fuel Used	10	gallons
Electricity from Coal		kW
Electricity from solar/wind		kW
Electricity from grid/mix		kW
Solid waste used		
Solid waste recycled		

2.2 Planning Section

2.2.1 Anticipated Activities
None

2.2.1.1 Planned Response Activities
None

2.2.1.2 Next Steps
None

2.2.2 Issues
None

2.3 Logistics Section
N/A

2.4 Finance Section

2.4.1 Narrative

On September 9, 2014, the EPA Phone Duty Officer opened a TDD with TetraTech (START) for the ER.

On September 10, 2014, the EPA Phone Duty Officer activated the ERRS Contractor (ER) to perform an emergency removal of the dye from the local roadways and parking lot.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$7,500.00	$3,200.00	$4,300.00	57.33%
TAT/START	$10,000.00	$2,600.00	$7,400.00	74.00%
Intramural Costs				
USEPA - Direct	$1,500.00	$500.00	$1,000.00	66.67%
USEPA - InDirect	$1,000.00	$500.00	$500.00	50.00%
Total Site Costs	$20,000.00	$6,800.00	$13,200.00	66.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

N/A

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

Michigan DEQ
Romulus Fire Department

4. Personnel On Site

EPA - 1
START - 1
ERRS - 4

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

N/A

7. Situational Reference Materials

N/A